

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

In re:

**MICHAEL GENE HICKEY AND
PAIGE LAEL HICKEY**

Case No. **12-70429**

Debtors

Chapter 7

**George I. Vogel, Trustee,
in Bankruptcy of Michael
Gene Hickey and Paige
Lael Hickey**

Plaintiff,

v.

**Michael Gene Hickey and
Paige Lael Hickey, et al**

Defendants

MOTION TO APPROVE SALE

George I. Vogel, II, Trustee hereby moves the Court for an order approving an offer in the amount of \$25,000.00 made by the Debtors for the purchase of the equity in their real estate, subject to the existing liens thereon, and in support thereof would respectfully show unto the Court as follows:

1. That he is the duly qualified and acting Trustee in Bankruptcy of the Debtors, Michael Gene Hickey and Paige Lael Hickey.
2. That by Order entered in this cause on November 16, 2012 the Trustee was authorized to sell the Debtors' said real estate at public or private sale free and clear of all liens provided that any offers received by the Trustee would be subject to approval by the Court.
3. That the Trustee has received an offer from the Debtors in the amount of \$25,000.00 to purchase the equity in their real estate from the Trustee, subject however to any and all liens properly recorded and constituting liens against their real estate.

4. That the Trustee is of the opinion that the offer of the Debtors in the amount of \$25,000.00 is reasonable and it is in the best interest of the Debtors' estate that the offer be accepted.

WHEREFORE, the undersigned Trustee respectfully prays that the Court approve the offer of the Debtors in the amount of \$25,000.00 and that the Trustee be authorized, upon the payment of such amount, to execute such deeds or releases as the Debtors may reasonably request and that the Trustee may have such further relief as the nature of this cause may require.

Dated this 17th day of April, 2013.

/S/ GEORGE I. VOGEL, II
George I. Vogel, II, Trustee
P.O. Box 18188
Roanoke, VA 24014
(540) 982-1220
Gvogel@vogelandcromwell.com

CERTIFICATE OF SERVICE

I hereby certify that I have this 17th day of April, 2013 mailed or electronically transmitted a true copy of the foregoing Motion with Notice attached to the Debtors, to counsel for the Debtors, to all parties named as Defendants to the Trustee's Motion, to all creditors as listed on the Debtor's mailing matrix and to the Office of the U.S. Trustee.

/S/ GEORGE I. VOGEL, II
George I. Vogel, II, Trustee

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

In re:

**MICHAEL GENE HICKEY AND
PAIGE LAEL HICKEY**

Case No. **12-70429**

Debtors

Chapter 7

**George I. Vogel, Trustee,
in Bankruptcy of Michael
Gene Hickey and Paige
Lael Hickey**

Plaintiff,

v.

**Michael Gene Hickey and
Paige Lael Hickey, et al**

Defendants

NOTICE OF HEARING

George I. Vogel, II, the Trustee in this case has filed a motion for an order for the approval of a sale of the Debtors' real estate. A copy of the motion is attached to this notice.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in the bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Trustee's motion or if you want the court to consider your views on the motion, then on or before 5:00 p.m. on April 29, 2013, you or your attorney must:

1. File with the court a written objection and a request for a hearing at:

**WRITTEN OBJECTION AND REQUEST FOR A HEARING TO BE
SCHEDULED SHOULD BE SENT TO:**

Clerk, U. S. Bankruptcy Court
Roanoke Division
210 Church Ave., SW, Room 200
Roanoke, VA 24011

2. If you mail your objection to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.
3. You must also mail a copy to:
Office of the U. S. Trustee
First Campbell Square Building
210 First Street, Suite 505
Roanoke, VA 24011 and to

George I. Vogel, II, Trustee
P. O. Box 18188
Roanoke, Virginia 24014
4. Attend the hearing scheduled to be held on **MAY 2, 2013 AT 10:00 A.M.** in the Courtroom of the United States Bankruptcy Court located on the 2nd Floor of the Commonwealth Building, Corner of 2nd Street and Church Avenue, SW, Roanoke, Virginia.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

The Trustee reserves the right to withdraw from the proposed sale should circumstances require. Requests for additional information should be directed to the Trustee.

Dated this 17th day of April, 2013.

/S/ GEORGE I. VOGEL, II
George I. Vogel, II, Trustee
P.O. Box 18188
Roanoke, VA 24014
(540) 982-1220
Gvogel@vogelandcromwell.com

CERTIFICATE OF SERVICE

I hereby certify that I have this 17th day of April, 2013 mailed or electronically transmitted a true copy of the foregoing Notice to the Debtors, to counsel for the Debtors, to all parties named as Defendants to the Trustee's Motion, to all creditors as listed on the Debtors' mailing matrix and to the Office of the U.S. Trustee.

/S/ GEORGE I. VOGEL, II
George I. Vogel, II, Trustee